

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
BALTIMORE DIVISION**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

**PHILIP R. JACOBY, JR.,
et al.,**

Defendants.

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17-cv-3230-CCB

DEFENDANT GREGORY LAW'S UNOPPOSED MOTION TO SEAL

Pursuant to Local Rule 105.11, Defendant Gregory Law respectfully requests that the Court issue an order permitting him to file his Motion to Compel the Production of Documents and Testimony under seal. Plaintiff Securities and Exchange Commission and Defendants Debrabandere, Jacoby, and Montgomery do not oppose this Motion to Seal.

Local Rule 105.11 provides that a motion seeking to seal documents filed in the Court include, “(a) proposed reasons supported by specific factual representations to justify the sealing and (b) an explanation why alternatives to sealing would not provide sufficient protection.” Defendant Law meets both requirements in this motion.

First, Defendant Law seeks to file this motion and accompanying materials under seal because the materials are the subject of a dispute over privilege, and a holder of the purported privilege, non-party BDO, has requested that this motion be filed under seal. Although Defendant Law disagrees with both BDO’s privilege assertion and the need to file this motion and accompanying materials under seal, he moves to file the underlying motion under seal while the privilege claim is being resolved.

Second, alternatives to sealing would not provide sufficient protection because these filings cannot be redacted in a manner that would satisfy BDO's interests.

Accordingly, Defendant Law respectfully requests that the Court enter an order placing the motion to compel and accompanying materials under seal. A proposed order is attached.

Respectfully submitted this 30th day of August 2019.

/s/
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